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April 9, 2018

VIA ECF

Hon. Cathy L. Waldor, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: St. Fleur v. City of Linden, et al.
Civil Action No. 2:15-cv-1464-SRC-CLW

Dear Magistrate Waldor:

This firm is counsel to plaintiff Patrick M. St. Fleur in the above referenced matter. In this regard, I write today to respectfully request an extension of the expert discovery deadlines, which were set during the prior status conference with Your Honor on February 28, 2018. Specifically, as it currently stands, plaintiff's affirmative reports are due on or before April 30, 2018, and responsive reports are due on or before June 15, 2018, and expert discovery is to end on July 15, 2018.

I write, with the consent of all counsel of record, seeking to extend these deadlines by sixty (60) days. Plaintiff's damages expert, Dr. Madelyn Milchman, as advised that due to scheduling conflicts and a pre-planned vacation, she needs the additional time to finalize her report. The new proposed dates would be as follows: ✓

Affirmative Reports	June 29, 2018
Responsive Reports—	August 14, 2018
Expert Discovery End Date	September 13, 2018

So ordered
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4/10/18

Case 2:15-cv-01464-SRC-CLW

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Hon. Cathy L. Waldor, U.S.M.J.
April 9, 2018
Page 2

If the Court has any questions, please do not hesitate to e-mail or call me. Thank you.

Respectfully submitted,

/s/ Robert J. Flanagan III

Robert J. Flanagan III

cc: All counsel of record (via ECF)